

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

AMY PALMER,

Plaintiff,

v.

CHAMPION MORTGAGE,

Defendant.

Civil Action No. 04-11-954-RCL

**DEFENDANT CHAMPION MORTGAGE'S OPPOSITION TO PLAINTIFF  
PALMER'S MOTION FOR RECONSIDERATION**

Defendant Champion Mortgage, a Division of KeyBank National Association ("Champion"), by and through its attorneys, Nixon Peabody LLP, hereby opposes Plaintiff Amy Palmer's ("Plaintiff") Motion for Reconsideration of this Court's December 22, 2005 order dismissing Plaintiff's Amended Complaint.

This Court should deny Plaintiff's Motion for Reconsideration for the reasons stated in Defendants' Memorandum of Law in Support of Defendant's Opposition to the Motion for Reconsideration submitted.

WHEREFORE, Defendant Champion Mortgage respectfully requests that this Court:

- a. Deny Plaintiff's Motion for Reconsideration;
- b. Affirm its Order granting dismissal of all claims against Champion; and
- c. Grant such further relief that this Court deems just and appropriate.

Respectfully submitted,

CHAMPION MORTGAGE, A DIVISION OF  
KEYBANK NATIONAL ASSOCIATION

By its attorneys,

NIXON PEABODY LLP

Dated: January 6, 2006

By: /s/ W. Scott O'Connell  
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